

## Appendix D

### Wisconsin Department of Natural Resources Environmental Cooperation Pilot Program (ECP) Program Performance Measures Table

The following table has been prepared jointly by the ECP external Advisory Group and the WDNR's internal ECP work group. The purpose of this table is to identify any potential and measurable ECP performance factors as outlined under s. 299.80 Wisconsin State Statutes, and to further determine how and by whom these factors will be measured. The "Performance Measures" column represents a "toolbox" of potential indicators which may vary from facility to facility. Facility owners are not bound by this list; others may also be identified and used by the facility owner. This list is only a suggested array of such measures.

Our goal in preparing this table is to provide both the WDNR and participating facilities a clearer framework from which to judge the effectiveness of the Pilot Program as a whole, as well as the effectiveness of each individual cooperative agreement.

#### Cooperative Agreement Performance Factors Table

Category	DNR Goals / Performance Factors	Performance Measures	Data Collector	Critical Success Factors	Data Collection Tools
Protection of the Environment	s. 299.80 (2) (a) Provide at least the same level of protection of public health and the environment as provided by the environmental regulatory methods under chs. 280 to 295.	<ul style="list-style-type: none"><li>• Changes in release rates over time</li><li>• Changes in emission rates per unit of production (or sales) over time</li><li>• Changes in volume of TRI emissions</li><li>• Presence of a formal, robust environmental management system (EMS)</li></ul>	Joint - Facility and DNR	Enhanced Environmental Protection	Cooperative Agreement Content [s. 299.80 (3) (g) and (k)] and UNC Data Protocols

Category	DNR Goals / Performance Factors	Performance Measures	Data Collector	Critical Success Factors	Data Collection Tools
<b>Protection of the Environment</b>	<b>s. 299.80 (2) (d)</b> Encourage facility owners and operators to Achieve superior environmental performance (4), both with respect to the effects of a facility that are regulated under chs. 280 to 295 and those effects that are unregulated, to reduce usage of natural resources, to minimize transfers of waste discharges among air water and land and to reduce waste generation, while achieving a balance among the economic, social and environmental impacts of these efforts that is acceptable to the community in which the facility is located.	<ul style="list-style-type: none"> <li>• Changes in emissions per unit of production</li> <li>• Changes in energy use per unit of production (or sales)</li> <li>• Change in processes that use or release of TRI compounds</li> <li>• Elimination of one or more TRI compounds</li> <li>• Changes in the number of regulatory exceedances, reportable events, notices of violation, or fines               <ol style="list-style-type: none"> <li>1. Air quality</li> <li>2. Water quality</li> <li>3. Solid waste</li> <li>4. Hazardous waste</li> <li>5. Other</li> </ol> </li> <li>• Changes in monetary value of long-term environmental liabilities</li> <li>• Changes in environmental capital and/or O&amp;M costs due to process changes</li> <li>• Presence of internal facility-based business scorecard that includes environmental factors</li> <li>• Production expansion where jobs are created in redeveloped (i.e., brownfield) sites</li> <li>• Presence of a formal environmental management information system</li> <li>• Cooperative agreement as catalyst for change, rate at which an EMS is enacted.</li> <li>• Number of Self disclosures/ corrective actions</li> <li>• Number of non-regulatory aspects</li> <li>• Number of activities undertaken with redirected resources.</li> </ul>	Joint - Facility and DNR	Enhanced Environmental Protection	Cooperative Agreement Content [s. 299.80 (3) (d)] and UNC Data Protocols

Category	DNR Goals / Performance Factors	Performance Measures	Data Collector	Critical Success Factors	Data Collection Tools
<b>Protection of the Environment</b>	<b>s. 299.80 (2) (m)</b> Encourage facility owners and operators and communities to work together to Reduce pollution to levels below the levels required under chs. 280 to 295.	<ul style="list-style-type: none"> <li>• Regulated parameter emissions reported below regulatory or permit levels</li> <li>• Percent change in regulated parameter emission levels below regulatory or permit levels</li> <li>• Implementation of formal supply chain environmental purchasing policies/practices with suppliers</li> <li>• Reduction in the toxicity of waste products</li> <li>• Change in the number of bio-accumulating substances discharged to water, air and land</li> </ul>	Joint - Facility and DNR	Enhanced Public Participation	Cooperative Agreement Content [s. 299.80 (3) (l-n)] and UNC Data Protocols, Departments of Health, POTW's, LEPC's, and RPC's
<b>Pollution Prevention</b>	<b>s. 299.80 (2) (b)</b> Encourage facility Owners and operators to systematically assess the pollution that they cause, directly and indirectly, to the air, water and land.	<ul style="list-style-type: none"> <li>• Conduct of pollution prevention (P2) assessments/audits</li> <li>• Implementation/adoption of P2 assessment findings</li> <li>• Formal life cycle assessments (LCA) conducted and utilized</li> <li>• Formal assessment and re-assessment of environmental aspects</li> </ul>	Facility	Enhanced Environmental Protection	Cooperative Agreement Content [s. 299.80 (3) (b)], UNC Data Protocols, and facility EMS

Category	DNR Goals / Performance Factors	Performance Measures	Data Collector	Critical Success Factors	Data Collection Tools
<b>Pollution Prevention</b>	<b>s. 299.80 (2) (c)</b> Encourage facility owners and operators to Implement efficient and cost-effective pollution reduction strategies for their facilities, while complying with verifiable and enforceable pollution limits.	<ul style="list-style-type: none"> <li>• Economic value of pollution prevention reductions (Short term costs of P2/ pollution control and long term savings and cost avoidance)</li> <li>• Changes in energy or raw material usage due to P2 activities</li> <li>• Changes in solid/hazardous waste generation and disposal</li> <li>• Changes in emissions to land, air and water</li> <li>• Changes in greenhouse gas emissions</li> <li>• Changes in stratospheric ozone depleting substances inventory or usage</li> <li>• Energy value of avoided waste generation</li> <li>• Energy value of recovered/reprocessed waste materials</li> </ul>	Joint - Facility and DNR	Enhanced Environmental Protection	Cooperative Agreement Content [s. 299.80 (3) (e) and (f)], UNC Data Protocols, facility EMS, and performance audits
<b>Flexibility and Cost Savings</b>	<b>s. 299.80 (2) (e)</b> Recognize and reward facility owners and operators who have demonstrated excellence and leadership in environmental stewardship or pollution prevention and who can achieve reductions in emissions and waste generation through implementation of innovative measures.	<ul style="list-style-type: none"> <li>• Public recognition/awards granted to or obtained by facility owners</li> </ul>	DNR as well as other independent entities	Enhanced Environmental Protection/Enhanced Public Participation	DNR to provide award-type incentives to facilities
<b>Flexibility and Cost Savings</b>	<b>s. 299.80 (2) (g)</b> Consolidate into a cooperative agreement environmental requirements relating to a facility owned or operated by a participant that are other wise included in separate approvals to the extent that consolidation is practical and efficient.	<ul style="list-style-type: none"> <li>• Changes in the number of permits required by a facility</li> </ul>	Joint - Facility and DNR	Improved Government and Business Efficiency	Cooperative Agreement Content [s. 299.80 (3) (i)]

Category	DNR Goals / Performance Factors	Performance Measures	Data Collector	Critical Success Factors	Data Collection Tools
<b>Flexibility and Cost Savings</b>	<b>s.299.80 (2) (h)</b> Grant the owners and operators of facilities greater flexibility than would otherwise be allowed under chs. 280 to 295 and rules promulgated under those chapters.	<ul style="list-style-type: none"> <li>Changes in number of days required for permit approval</li> <li>Changes in number of parameters or measurements required to be collected, recorded or reported</li> <li>Number of variances granted and associated trade-offs.</li> </ul>	DNR	Improved Government and Business Efficiency	Cooperative Agreement Content [s. 299.80 (3) (h)]
<b>Flexibility and Cost Savings</b>	<b>s. 299.80 (2) (i)</b> Seek to Reduce the time and money spent by government and owners and operators of facilities on paperwork and other administrative tasks that do not result in benefits to the environment	<ul style="list-style-type: none"> <li>Number of separate reports/submissions required</li> <li>Changes in the number of facility technical and/or administrative staff hours</li> <li>Changes in the number of regulatory agency technical, enforcement and/or administrative staff hours</li> <li>Economic value of reduced administrative, technical, and regulatory staff hours</li> <li>Costs of implementation and maintenance of an EMS</li> <li>Changes in facility and DNR time required in permitting process</li> </ul>	Joint - Facility and DNR	Improved Government and Business Efficiency/Enhanced Environmental Protection	Cooperative Agreement Content [s. 299.80 (3) (p)], and DNR to measure government portion
<b>Information Sharing</b>	<b>s. 299.80 (2) (f)</b> Encourage the transfer of information about methods for improving environmental performance and the adoption of these methods by others.	<ul style="list-style-type: none"> <li>Number of regulated parameters reported to the public</li> <li>Number of nonregulated parameters reported to the public</li> <li>Availability of environmental performance information on several media formats (e.g., printed reports/summaries, websites, etc.)</li> </ul>	DNR	Enhanced Environmental Protection/Improved Government and Business Efficiency	DNR to assist via its web site, case studies, press releases, and public records.

Category	DNR Goals / Performance Factors	Performance Measures	Data Collector	Critical Success Factors	Data Collection Tools
<b>Information Sharing</b>	<b>s. 299.80 (2) (l)</b> Provide public access to information about performance evaluations conducted by participants in the program under this section.	<ul style="list-style-type: none"> <li>• Number of EMS audits performed and results reported to public</li> <li>• Number of corrective actions or system improvements resulting from audits</li> <li>• Changes in volume of emissions resulting from audits</li> <li>• Management system changes or improvements resulting from EMS audits</li> </ul>	Joint - Facility and DNR	Enhanced Public Participation	Cooperative Agreement Content [s. 299.80 (3) (l-n)], and DNR public records
<b>Information Sharing</b>	<b>s. 299.80 (2) (k)</b> Seek to improve the provision of useful information to the public about the environmental and human health impacts of facilities on communities.	<ul style="list-style-type: none"> <li>• Number of parameters reported by facility as requested by Community Advisory Panel (CAP)</li> <li>• Number of environmental parameters reported as both absolute and normalized data</li> <li>• Additional qualitative indicators that may be easily understandable to the public in lay terms</li> </ul>	Joint - Facility and DNR	Enhanced Public Participation	Cooperative Agreement Content [s. 299.80 (3) (l-n)], DNR case studies, DNR web site
<b>Public Participation &amp; Trust</b>	<b>s. 299.80 (2) (j)</b> Encourage public participation and consensus among interested persons, in the development of innovative environmental regulatory methods and in monitoring the environmental performance of projects under this section.	<ul style="list-style-type: none"> <li>• Formation (diversity of group) and presence (reason for being there) of a Community Advisory Panel (CAP)</li> <li>• Number or periodicity of CAP meetings</li> <li>• Number of process or management system changes resulting from input from CAP or other external stakeholders</li> </ul>	Joint - Facility and DNR	Enhanced Public Participation	Cooperative Agreement Content [s. 299.80 (3) (l-n)]

Category	DNR Goals / Performance Factors	Performance Measures	Data Collector	Critical Success Factors	Data Collection Tools
<b>Public Participation &amp; Trust</b>	<b>s. 299.80 (2) (n)</b> Seek to Increase trust among government, facility owners and operators and the public through open communication and support of early and credible resolution of conflicts over issues concerning the environment and environmental regulation.	<ul style="list-style-type: none"> <li>• Number of actions taken in response to CAP input</li> <li>• Number of audits performed with agency staff observing</li> <li>• Number of audits performed with members of CAP observing</li> <li>• Number of people touring the facility during open houses</li> <li>• Economic value of process modifications or P2 efforts taken in response to CAP input</li> <li>• Results of “exit polls” or other indices to measure community relations status</li> <li>• Number, Quality and Nature of public inquiries</li> </ul>	Joint - Facility and DNR	Improved Government and Business Efficiency/Enhanced Public Participation	Cooperative Agreement Content [s. 299.80 (3) (l-n)], and DNR public trust survey development, or use of existing surveys (ex: WMC), citizen complaint files, citizen interviews.